-			
	Page 49		Page 51
1	Q Could you find the page and look at the	1	refreshed your memory as to the communications you
2	note.	2	had with Tripp. Is that true?
3	A (Reviews documents.) I know where it	3	A Yes, sir. That's correct.
4	might be. It's on that communication with David	4	Q Okay. Having looked at your note that you
5	Freeman.	5	wrote to your attorney in Pennsylvania can you tell
6	MR. SIMOPOULOS: Oh. It's attorney/client	6	me now what that communication was with Tripp in
7	privilege document. It's the attorney.	7	Pennsylvania?
8	MR. PURICELLI: Strike out the part that's	8	A I can't tell you about the content of it.
9	the attorney/client privilege. That's all we	9	It was just the fact that I didn't initiate contact
0	have to do.	10	with him. He was the one who had called me.
1	MR. PURICELLI: Who's Attorney Freeman?	11	Q Okay. And having now learned that he was
2	MR. SIMOPOULOS: That's his attorney in	12	the one that called you, does that help refresh your
3	Pennsylvania.	13	memory as to what the two of you talked about?
4	MR. PURICELLI: Okay. Strike out that	14	A No, sir. I said I can't remember the
5	part.	15	content of what we talked about.
6	MR. SIMOPOULOS: Just let me see the	16	Q Have you received communications from the
7	document. You come with me.	17	sergeant from the Pennsylvania State Police before
8	MR. PURICELLI: Take a break?	18	this communication?
9	THE WITNESS: Sure.	19	A Before which communication?
0	(Proceedings temporarily off the	20	Q The one from Tripp to you?
1	record after which time the	21	A I don't recall.
2	following resumed on the	22	Q Was that communication before or after
3	record.)	23	warrants that you had procured for Mr. Bush had been
4	MR. PURICELLI: We took a short break, and	24	issued?
5	it's been disclosed to us by the city attorney	25	A You want to know
	Page 50		Page 5
1	that there are other documents that may exist	1	2 Types want to mile with your tanneas to mile
2	that have been deemed by Counsel to be	2	
3	attorney/client privilege, and the City's	3	The state of the s
4	attorney has graciously agreed to provide us	4	was an approximate ten-ten day period when the
5	with a privileged log so that we can look at	5	William West detailing of this will will be the second
6	those documents. Have I stated that	6	are and the same a
7	accurately?	7	Q Okay. And do you recall anything
8	MR. SIMOPOULOS: Actually, the documents	8	Lieutenant Russell told you he was doing before the
9	were created after the lawsuit was filed.	9	warrants were obtained? Specifically in this Bush
0	MR. PURICELLI: I haven't identified	10	case.
1	anything I just want to see if there are other	11	A Right. No. I knew he was either in
2	documents.	12	contact with some entity in Pennsylvania, the State
.3	MR. SIMOPOULOS: Okay.	13	Police or the FBI at that point.
4	MR. PURICELLI: There has been a	14	
5	discussion off the record that the note	15	,
6	gg	16	
7		17	
8	Mr. Adams' attorney in Pennsylvania, Mr.	18	had met with her previously. I believe it was on or
9	Freeman. Is that correct?	19	about the day or the day after Mr. Bush came to
0	THE WITNESS: Yes.	20	town.
1	BY MR. PURICELLI:	21	The state of the s
2	Q And I have agreed that communications	22	A She was basically distraught about what
3	between Mr. Adams and his attorney could be covered	23	had happened, indicated certain other things that I
24	under the attorney/client privilege. However, it's	24	mentioned about their past abusive relationship,
25	been represented to me that the note may have	25	what she intended to do in terms of getting the

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Deposition of Sergeant Sean Adams

T	Page 53		Page 5:
1	children back or the court order. I only have a	1	It's a preliminary protective order.
- 1	vague memory of it.	2	Q Right. And that was a protective order,
3	Q Did she provide you with any court order		not a custody order; correct?
1	saying that she had lawful custody of the children?	4	A Right.
	A No. Not at that time, sir.	5	Q Is it also true in the protective order
	Q What if anything did you advise her?	6	temporary custody was granted based on the temporary
	A I advised her that the court of record at	7	order being given?
	that time was in Pennsylvania. That was probably	8	A I'm sorry.
1	where she needed to go to have that overturned or	9	Q I'll rephrase it. The order referring to
1	addressed with some other legal remedy.	10	
	Q Had you done any type of investigation at	11	it?
1	all at the time she was talking to you? Do you	12	A Right. It is a preliminary protective
- 1	remember whether or not there were any court	13	order that grants custody to a parent, that being
	proceedings in Virginia for custody of the children?	14	Sarah Serene.
	A Can you rephrase that for me.	15	Q Okay. Just so that the judge up in
	Q I can. Prior to Ms. Bush coming to you	16	
	and telling you what she intended to do, had you	17	going to read this transcript, the temporary order
	done any investigative work by contacting the family	18	
1	court, the juvenile court to determine whether there		
- 1	was any Virginia action for custody of the children?	20	***
	A I don't recall. I believe I addressed	21	A That's correct.
	that issue with her. And I just don't recall what	22	Q He wouldn't have been present for the
	the response was at that point.	23	presentment of the paper to the Court; correct?
	Q Relying on your training for this type of	24	A It wasn't necessary for him to be there.
5	situation and your experience for this type of	25	Q And he wasn't there to your knowledge;
1	Page 54		Page 5
L	situation would you ordinarily contact family court	1	correct?
2	to find out whether or not a parent does or does not	2	A Correct.
3	have an ongoing custody matter in Virginia or	3	Q And this order is based solely on her
	already has an order?	4	representations to the Court; correct?
5	MR. SIMOPOULOS: Objection to form. Are	5	A Correct.
5	you referring to family court in Virginia?	6	Q All right. And based on her
7	BY MR. PURICELLI:	7	
3	Q In Virginia.	8	protections from Mr. Bush; correct?
9	A Well, Virginia usually one parent or the	9	A She obtained a preliminary protective
	other has paperwork indicating custody and	10	order.
1	possession of the children and visitation.	11	Q And the purpose of the order is to give
2	Q And we've gone through your file and you	12	
3	have no court order from Virginia saying Ms. Bush	13	A Protection and custody of the children.
1	had custody of the children at issue before you got	14	Q All right. Now, are you aware that order
5	the warrants. Isn't that true?	15	was summarily dismissed upon first review of the
5	A That's correct.	16	assigning judge?
7	Q And I'm just trying to find out whether	17	MR. PURICELLI: Objection. You can answer
3	you had looked to see if there was ongoing custody	18	
3	proceedings in Virgina since you know there was no	19	
)	court order.	20	
	A I believe the one in Virginia is dated the	21	Q Did you do anything in the course of your
L		1	
		22	investigation to determine whether or not the Court
2	25th which is the same day I want to make sure	22	8
1 2 3 4		22 23 24	when reviewing the order had dismissed it?

	Page 57		Page 59
1	you do anything to find out whether it had been	1	order would become a permanent order?
2	dismissed?	2	MR. SIMOPOULOS: Objection. That's not
3	A I don't recall.	3	relevant but go ahead. You can answer.
4	Q What would be the ordinary procedures when	4	THE WITNESS: I believed the probability
5	you're faced with a temporary order to determine	5	that it was going to be permanent was
6	whether or not a parent has been given permanent	6	relatively high compared to the other cases
7	custody or custody after a hearing?	7	which I'd seen based upon the long-term
8	MR. SIMOPOULOS: Objection to form.	8	residence of the children here in Richmond,
9	BY MR. PURICELLI:	9	based upon the facts and circumstances in the
10	Q Do you understand the question?	10	case involving Mr. Bush.
11	A No, sir; I don't.	11	BY MR. PURICELLI:
12	Q All right. You understand there's going	12	Q In your experience with people who have
13	to be a hearing to determine the voracity or	13	established what you refer to as long-term residency
14	truthfulness of her allegations. Isn't that true?	14	here had you ever come across a person claiming to
15	A That's correct.	15	be a long-term resident here that had changed their
16	Q And you see these types of orders all the	16	identity and the identity of the children?
17	time; correct?	17	MR. SIMOPOULOS: Objection to form. You
18	A Frequently.	18	can answer again. Calls for speculation as
19	MR. SIMOPOULOS: Objection to form.	19	well.
20	BY MR. PURICELLI:	20	MR. PURICELLI: I'm just asking if he
21	Q And you understand there are many times	21	recalls ever having those facts. I don't know
22	that these orders are only temporary to the point	22	why that's speculative.
23	the Court hears the allegations; correct?	23	THE WITNESS: I don't recall those facts.
24	A Some are I imagine.	24	BY MR. PURICELLI:
25	Q In your experience you've learned some of	25	
23	Page 58	23	Q Do you recall ever coming across facts Page 60
1	_	1	where a parent claims to have long-term residency
2	these orders never turn into permanent orders.	1 1	where a parent claims to have long-term residency
	Touls should be a simple		
	Isn't that true?	2	that also changed the children and her social
3	A Some don't. That's correct.	2	that also changed the children and her social security numbers?
3 4	A Some don't. That's correct.  Q Okay. And what reason did you have to	2 3 4	that also changed the children and her social security numbers?  A Is that the same question?
3 4 5	A Some don't. That's correct. Q Okay. And what reason did you have to believe this order was going to be a permanent	2 3 4 5	that also changed the children and her social security numbers?  A Is that the same question?  Q No. The other was identity. This one is
3 4 5 6	A Some don't. That's correct. Q Okay. And what reason did you have to believe this order was going to be a permanent order?	2 3 4 5 6	that also changed the children and her social security numbers?  A Is that the same question?  Q No. The other was identity. This one is social security number.
3 4 5 6 7	A Some don't. That's correct. Q Okay. And what reason did you have to believe this order was going to be a permanent order?  MR. SIMOPOULOS: Objection to form.	2 3 4 5 6 7	that also changed the children and her social security numbers?  A Is that the same question?  Q No. The other was identity. This one is social security number.  A Not that I recall.
3 4 5 6 7 8	A Some don't. That's correct.  Q Okay. And what reason did you have to believe this order was going to be a permanent order?  MR. SIMOPOULOS: Objection to form.  BY MR. PURICELLI:	2 3 4 5 6 7 8	that also changed the children and her social security numbers?  A Is that the same question?  Q No. The other was identity. This one is social security number.  A Not that I recall.  Q Did you ever come across where a person
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3 4 5 6 7 8 9	A Some don't. That's correct. Q Okay. And what reason did you have to believe this order was going to be a permanent order? MR. SIMOPOULOS: Objection to form. BY MR. PURICELLI: Q You can answer it if you understand. A Based upon the facts and circumstances in	2 3 4 5 6 7 8 9	that also changed the children and her social security numbers?  A Is that the same question?  Q No. The other was identity. This one is social security number.  A Not that I recall.  Q Did you ever come across where a person claiming to be a long-time resident of Richmond was already a respondent in a custody action in another
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Deposition of Sergeant Sean Adams

_	Page 61		Page 63
1	Page 61 BY MR. PURICELLI:	1	A No. Pretty sure I didn't talk to her
2	Q in Virginia?	2	about being sued.
3	MR. SIMOPOULOS: Objection to form.	3	Q Did you talk to her about any custody
4	BY MR. PURICELLI:	4	proceedings she had in Virginia?
5		5	A I don't recall.
6	Q You can answer if you understand.  A I'm not sure I understand.	6	Q If you had would you have noted it in a
7		7	police report?
8	Q You're saying based on these facts and circumstances you believe she was going to get a	8	MR. SIMOPOULOS: Objection to form.
9	permanent order. Did I understand that correctly?	9	BY MR. PURICELLI:
10	A Yes.	10	Q You can answer that.
11	Q Okay. And I'm asking you based on that	11	A Probably not.
12	belief had you ever come across a fact where the	12	Q In the course of your history of being a
13	person with the temporary order had fled another	13	police officer have you had communications with
14	state where she was already involved in a custody	14	people that you don't make notes about? And I mean
	action with the children?		
15 16	MR. SIMOPOULOS: Objection to form.	15	particularly about a case. I don't mean friends and stuff.
17	MR. PURICELLI: How about if I change the	17	A Can you restate that.
18	word fled to left? Is that going to help?	18	Q In your history as a police officer have
19	MR. SIMOPOULOS: Objection to form.	19	you had communications with persons alleged to be
20	MR. PURICELLI: Okay. I'll rephrase it to	20	victims of crimes and not made notes about it?
21	left the state as opposed to fled.	21	A Yes.
22	MR. SIMOPOULOS: Compound. Objection to	22	Q What types of crimes would the victim be
23	form.	23	
24	BY MR. PURICELLI:	24	not make notes of that communication?
25	Q You can answer it.	25	A (No response.)
_	Page 62		Page 64
1	A Okay. Not that I recall.	1	Q Let me help you out. Did it involve an
2	Q All right. So what was it then that you	2	allegation of kidnapping?
3	believed from the facts and circumstances that you	3	A No, it didn't. No. Not that I can
4	believed her allegations were going to be accepted	4	
5	by the Court and she would end up with a permanent	5	Q Prior to the kidnapping charges you
6	order for protection from Mr. Bush and custody of	6	
7	the children?	7	leveled a kidnapping child against a parent?
8	And the second s	8	MR. SIMOPOULOS: Objection to form.
9	with the children, that they were divorced, she had	9	THE WITNESS: I don't recall.
10	long-term residence in Virginia, and the facts as I	10	BY MR. PURICELLI:
11	knew them at the time were that the other order had	11	Q Since Mr. Bush how many people have you
12	been overturned. That's basically all I can think	12	charged with kidnapping their own children?
13	of right now.	13	A None.
14	Q Okay. Had those types of facts come up in	14	Q Okay. So is it true then Mr. Bush is the
15	your experience as a police officer before in this	15	only person that you have charged with kidnapping
16	unit that you're working?	16	his own children?
17	A Not that I recall.	17	MR. SIMOPOULOS: Objection to form. Asked
18		18	and answered.
19		19	
20		20	Q You can answer.
21	than these two with her, ever?	21	A I can't say no. I can't say that he's the
22	A Ever?	22	
23		23	Q Well, my question is kidnapping their own
		24	
24		25	1
25	Q Did you talk to her about being sued?	125	A No. I can't say that.

Q Can you give me any recollection at all of ever charging another parent with kidnapping their should do with the Richmond Police Department to declare those children missing?  MR. SIMOPOULOS: Objection. Asked and answered.  THE WITNESS: We get a few of those. I can't say that — I mean, I know I've over seen other cases involving that.  BY BYMR, PURICELLI: Q All right. In those other cases did a purent have a court order at the time of the charge? A I don't know. Q What do you classify as long term? A All depends on what you're talking about. Q What do you classify as long term? A I was was a long-term resident. And I want to be cause she was all obtain a permanent order was because she was all obtain a permanent order was certain city, I think a year is long term, certain city, I think a year is long term, C A I was to lod approximately a year. Q How long had Ms. Bush lived in Richmond? A I twas determined that her kids were emolled in school. Couldn't establish an exact duration. Through DMV records indicated a previous address as well in the city, I can verify that if you'd like. Q I just want to know what you knew. Now, when Ms. Bush originally came to you did she want Ms. Bush originally came to you did she want Ms. Bush originally came to you did she want Ms. Bush wrested? MR. SIMOPOULOS: Objection to form.  THE WITNESS: Yes.  BY MR. PURICELLI: Q You can answer. A I don't know. Q I just want to know what you knew. Now, when Ms. Bush originally came to you did she want Ms. Bush arrested? MR. SIMOPOULOS: Objection to form.  THE WITNESS: Yes. BY MR. PURICELLI: Q You can answer. A I was in the clinden declared as missing children? A Recause at that time we believed he had a legitimate court order indicating that the had right is courted. A I was in the office that day. I recall seeing paperwork to see if the rewer any problems or if everything was in order the police department and to your understanding of the law? A I all down that the paperwork to see if the rewer any problems or if everything was in order	-		Page 65		Page 67
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legitimate court order indicating that he had right 24 Mr. Bush.		22	Q Why not?	22	Commonwealth's Attorney's Office at that point. And
		23	A Because at that time we believed he had a	23	
to custody. 25 Q Did anybody give Mr. Bush any instructions		24	legitimate court order indicating that he had right	24	Mr. Bush.
		25	to custody.	25	Q Did anybody give Mr. Bush any instructions

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Deposition of Sergeant Sean Adams

- 1	Page 69		P	age 71
1	after the children were turned over to him?	1	materially misrepresented facts or had	
2	MR. SIMOPOULOS: Objection to form.	2	misrepresented material facts to obtain this custody	
3	MR. PURICELLI: Well, okay. I'll rephrase	3	order?	
1	that. That's fair.	4	A Yes, I did.	
5	BY MR. PURICELLI:	5	Q What was that?	
5	Q Did you or did anyone in your presence	6	A Based upon Ms. Bush being associated with	
7	give Mr. Bush any instructions as to what he should	7	Luzerne County.	
3	do after receiving custody of the children?	8	Q Are you familiar with Pennsylvania law?	
)	A No, sir. Not that I recall.	9	MR. SIMOPOULOS: Objection to form.	
)	Q Did you hear anyone say to him you need to	10	Argumentative.	
L	leave Virginia now?	11	BY MR. PURICELLI:	
	A I don't recall.	12	Q You can answer that. Are you familiar	
	Q Would that be something that would be told	13	with Pennsylvania law relating to filing or seeking	
	to a person in that situation?	14	custody orders in counties?	
,	A I can't say that it would be something	15	A Do you want me to review the order?	
	that I would say. I'm not saying that it couldn't	16	Q No. I'm just asking if you're familiar	
	or wouldn't or wasn't said but can you re-ask the	17	with the law	
	question.	18	MR. SIMOPOULOS: Objection to form.	
)	Q Well, you're not saying you can't say it	19		
)	wasn't said. You're saying to me you wouldn't have	20	Q as to who can go to what county and	
L	said it. But you're not telling me somebody else	21	obtain court orders in regards to custody and	
2	didn't say it. Do I understand that correctly?	22	divorce?	
3	A I'm not saying somebody didn't say that.	23	A I'm not familiar with the entirety of	
Į	Q Okay.	24	Pennsylvania law.	
5	A I can't confirm or deny whether that	25	Q Okay. Were you familiar as to whether or	
	Page 70		P	Page 1
1	happened.	1	not Mr. Bush could go to a county of non-residence	
2	Q That's fair. Let's assume for the	2	and obtain a custody order?	
3			and obtain a custody order:	
	purposes of this next question that he was told that	3	A No, no. I was not familiar.	
1	by Richmond City Police. Would you have to tell the			
		3	A No, no. I was not familiar.	
5	by Richmond City Police. Would you have to tell the	3 4	A No, no. I was not familiar.  Q What was it that made you believe he	
5	by Richmond City Police. Would you have to tell the magistrate that issued the warrants that he was	3 4 5	A No, no. I was not familiar.  Q What was it that made you believe he materially misrepresented something in another	
5	by Richmond City Police. Would you have to tell the magistrate that issued the warrants that he was advised to leave Virginia with the children by the	3 4 5 6	A No, no. I was not familiar.  Q What was it that made you believe he materially misrepresented something in another county to obtain a court order?	
5 7 3	by Richmond City Police. Would you have to tell the magistrate that issued the warrants that he was advised to leave Virginia with the children by the police?	3 4 5 6 7	A No, no. I was not familiar.  Q What was it that made you believe he materially misrepresented something in another county to obtain a court order?  A Based upon the statements of Ms. Bush.	
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